

File No. 1694-8

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF:

Chapter 13

Ursula Brenda Gulley,

Case No. 09-04698

Debtor.

Honorable Judge Cox

**RESPONSE TO NOTICE OF CURE OF ALL PRE-PETITION  
MORTGAGE OBLIGATION**

Now comes, Litton Loan Servicing, LP and files this Response to the Trustee's Notice of Final Mortgage Cure Amount and in support states as follows:

1. That on July 7, 2009, Chapter 13 Trustee Thomas Vaughn filed a Notice of Payment of Final Mortgage Cure Amount. The Notice was subsequently served on Litton and indicated that if the creditor is not post petition current, it must file a response within sixty days of said Notice. This response is being filed within that time frame.

2. The Debtor is not current on its post-petition mortgage payments on Litton's first lien regarding the real estate located at: 216 Shea Drive, Flossmoor, Illinois ("Real Estate").

3. That since there is a post petition default the mortgage should not be considered fully reinstated.

4. The loan is post petition due for June 1, 2009. The following is due and owing:

- i. June 1, 2009 to August 1, 2009 at \$2,302.47 each for a total of \$6,407.41; and,
- ii. Late charges of \$345.36;

That the total post petition default totals \$7,252.77. That based upon Debtor's default, the mortgagee is not required to treat the mortgage reinstated and fully current. That the creditor reserves the right to amend this response.

Respectfully submitted,

/s/ Mitchell A. Lieberman  
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